

DECLARATION OF KIANDRIA DEMONE BOYCE IN SUPPORT OF MOTION TO REQUIRE ALTERNATE SERVICE

I, Kiandria Demone Boyce, declare as follows:

1. Plaintiff has submitted a screenshot purporting to show that I opened an email she sent and ignored it. This is inaccurate and misleading. I can produce a screenshot from my own inbox showing that the email remains unopened.
2. In a prior declaration, I informed the Court that I would not open Plaintiff's emails. I made this decision because Plaintiff has misused TRO to monitor and intimidate me, repeatedly mischaracterized my speech and accused me of violence I have not engaged in. For my safety, I do not feel comfortable communicating with Plaintiff by email without counsel or direction from the Court.
3. Plaintiff's reliance on email tracking to claim I have opened her messages raises significant concerns about the reliability of her chosen method of service. If her system generates inaccurate or misleading information, then her service cannot be trusted.
4. I have complied with the TRO and all court orders. My decision not to open Plaintiff's email is not hostile but protective, to avoid further false accusations.
5. Because Plaintiff insists on serving documents and attempting conferral through email despite these issues, I respectfully ask the Court to require her to use another method of service that is reliable, verifiable, and not subject to manipulation—such as U.S. Mail or filing through the Court's CM/ECF system.
6. Because Plaintiff has repeatedly mischaracterized my speech as unlawful or violent when it is not, and because she is now using unreliable and misleading email tracking against me, I believe it is unsafe and unreasonable to confer directly with her without counsel or further direction from the Court. For this reason, I am unable to comply with conferral under LR 7-1(a) in this instance.
7. I also have serious due process concerns. Plaintiff has continuously monitored my activity in a way that I experience as intimidating, and is now using inaccurate or potentially manipulated email tracking to create a false record. She has already presented disputed "evidence" to the Court claiming that I opened an email when my own documentation shows it was never opened. In addition, Plaintiff repeatedly characterizes me as hostile, aggressive, violent, and dangerous. These accusations are untrue, and they cause me significant mental stress because they amount to an attack on my character and distort the way the Court may view me. It is deeply unfair for Plaintiff to rely on such tactics in an attempt to obtain court orders against me. This practice places me at risk of being mischaracterized as noncompliant when I am not, and it leaves me feeling unsafe and as though the proceedings themselves are becoming unfair.
8. Defending this case from Georgia, while it proceeds in Oregon, is already a significant burden. I must rely almost entirely on digital resources to participate. Plaintiff's use of

unreliable or misleading digital tools, such as email tracking, compounds this burden and increases the risk of misrepresentation against me. This added unfairness is one reason I have raised concerns about jurisdiction, as the distance and reliance on digital communication make it even more difficult to ensure a fair process. It is already an extraordinary hardship to defend myself from out of state without the added risk of manipulated digital "evidence."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 26, 2025 at Marietta, Georgia.

/s/ Kiandria Demone Boyce
Kiandria Demone Boyce
Defendant, Pro Se
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